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May 6, 2024

VIA ECF and email to Torres.NYSDChambers@nysd.uscourts.gov

Hon. Analisa Torres, U.S.D.J.

U.S. District Court for the Southern District of N.Y.

500 Pearl Street, Courtroom 15D

New York, New York 10007-1312

**Re: *Blockware Solutions LLC v. American Mining Warehouse LLC and Tyler Deboer,*
Case No. 1:24-cv-02523-AT (S.D.N.Y.) / Stipulated Extension Request**

Dear Judge Torres,

This Firm was retained today to represent Defendants American Mining Warehouse LLC and Tyler Deboer (“Defendants”) in the above-referenced action. Consistent with Your Honor’s Individual Practices, we write to respectfully request an extension of time to answer or otherwise respond to the Complaint of Plaintiff Blockware Solutions LLC (“Plaintiff”). We make this request with the consent of Plaintiff’s counsel.

Because we were just retained, Defendants and their counsel require additional time to investigate and respond to the allegations and claims made by Plaintiff. Plaintiff’s counsel has consented to this request on the condition that Defendants waive any objection to service of process, which Defendants hereby waive while preserving all other objections (including but not limited to personal jurisdiction).

Accordingly, Defendants respectfully request a 30-day extension of the deadline to respond to Plaintiff’s Complaint, from the current deadline of May 6, 2024, to June 5, 2024. We further request that the Court extend by 30 days the deadlines set in the Court’s April 3, 2024 Initial Pretrial Scheduling Order and Order regarding consent to proceed before a Magistrate Judge (ECF Nos. 9 & 11).

This is Defendants’ first request for an extension and does not affect any scheduled dates other than those mentioned above. We thank the Court for its consideration of this request.

Respectfully submitted,

/s/ Stuart Kagen
Stuart Kagen

cc: All counsel (via ECF)